5/27/97

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Document No		Document Title
RF/ER-96-0020 96-DMR-ERM-0031	REV 3	Field Sampling Plan for the Source Removal of Trenches T-3 and T-4 (IHSSs 110 and 111 1)

Instructions: **Remove and destroy pages 17 & 18 from the above noted procedure and replace with the attached new pages 17 & 18**

"NEW" - Appendix 6, file at the end of the procedure

Signing Receipt Acknowledgement indicates you have read and understand the above documents
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3 5 3 Sampling After Treating Debris

After debris is processed in the TDU, the debris itself will not be sampled to show attainment of performance goals Rather, in accordance with EPA guidance, samples will be collected from soil residues commingled with the processed debris These soil "residues" will be analyzed for total VOCs using either the screening method listed in Appendix 2 or SW-846 Method 8240/8260 These samples will be collected from commingled soil which is expected to be "caked on" to some of the debris Sample results will be evaluated against the VOC action levels listed in 6 CCR 1007-3, Section 261 24 (the TCLP standards), to support proper disposition of the waste

3 5 4 Sampling of Debris for Other than VOCs

A hazardous waste determination will be required for all debris In some instances, this determination may be able to be made without the need for the collection of additional samples, based on the type of debris, and its prior use before becoming a waste However, in other situations, information will not be available to make a determination without the aid of appropriate analytical results Therefore, flexibility will be given to the field supervisor in making these determinations It is expected that the field supervisor will work with the RFETS Waste Management Organization in determining analysis requirements (other than for VOCs) for debris slated for off-site disposal Any additional sampling will be fully documented in the sample logbook

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Appendix 5 describes additional debris sampling and analytical requirements for any debris destined for disposal at the Envirocare of Utah, Inc , facility For a description of sampling activities associated with granualar activated carbon (GAC) see Appendix 6

3.6 SAMPLING BELOW CONTAMINATED FEED STOCKPILES

After completing the treatment of soils from both trenches, contaminated soil will be scraped off the contaminated soil and debris feed stockpiles and treated as necessary Soil will be scraped off and treated such that remaining soil below the stockpiles will have no residual contamination remaining above the trench bottom cleanup values listed in Table 3 2 of the approved PAM Soils treated as part of this operation will meet the treatment performance standards specified in Table 3 4 of the PAM

Following removal of soil suspected to be contaminated with residual VOCs, each stockpile (40' x 40') will be divided into 4, approximately equal area squares (20' x 20') One grab sample will be collected from the center of each square, approximately 0-2" below the surface, and analyzed for VOCs using the screening method described in Appendix 2

In addition to these samples, the field supervisor and project manager may evaluate and collect samples from other areas which have a potential for residual VOC contamination, from incidental spills during operations, etc As appropriate, this determination will be fully documented in the project logbook

APPENDIX 6

SAMPLING AND ANALYSIS PLAN

for the

GRANULATED ACTIVATED CARBON WASTE

from the

T-3/T-4 PROJECT AND BUILDING 891

May 21, 1997

1.0 INTRODUCTION

The purpose of this sampling and analysis plan is to describe the sampling activities to be performed to characterize the waste granulated activated carbon (GAC) being prepared for shipment to the Idaho National Engineering and Environmental Laboratory (INEEL) for incineration The GAC to be sampled was used on the T-3/T-4 Project in the thermal desorption unit (TDU) treatment system and in Building 891 Consolidated Wastewater Treatment Facility to treat the condensate generated by the T-3/T-4 TDU The GAC to be sampled is stored in 55 gallon drums in Storage Units 15a and 1804 Existing chemical and radiological information on the GAC can be found in the Special Task Health and Safety Plan (HSP) for Evaluation of Granulated Activated Carbon

2.0 SAMPLING AND DATA QUALITY OBJECTIVES

The purpose of this sampling effort is to augment existing characterization on the waste GAC for acceptance at the INEEL incinerator The specific data needed by the INEEL is the total sulfur and total mercury characteristics of the GAC, as well an isotopic determination of the radiological contamination in the GAC

3.0 SAMPLE COLLECTION AND ANALYSIS

The Special Task HSP and radiological work permit will be followed during the sampling effort Two sets of samples will be collected from open top 55 gallon drums storing the waste GAC First the drum rings and inner liners will be opened to expose the GAC Industrial hygiene monitoring will be performed in the work space during this activity to determine if volatile organic concentrations are present The samples will be collected using a spoon or similar device, and the GAC will be placed directly into the sample containers The samples will be taken as described in Table 1 Once the samples are collected, the drum liners will be re-sealed and the drum rings will be bolted closed The sampling equipment and personnel protection equipment used during the sampling will then be surveyed by a radiological control technician The samples will then be handled in accordance with *Environmental Management Department Operating Procedures, Volume 1, Field Operations 5-21000-OPS-FO 13*, and the data will be managed according to *Environmental Management Department Operating Procedures, Volume 1, Field Operations 5-21000-OPS-FO 14*

One sample will be collected from drum D87122 located in Storage Unit 15a, Cargo #28, 904 Pad The second sample will be collected from D87309 located in Storage Unit 1804, Cargo #11 (Contractor Yard) Both samples will be analyzed for total sulfur, total mercury, and have an

isotopic determination performed

Since only two samples will be taken during this event, both from similar material contaminated with similar compounds, no quality control samples will be necessary It will be assumed that all detections are real, and not a result of cross contamination

Table 1. Sample Description

Drum No	Origination Process	Location	Sample No	Analysis	Container
D87122	T-3/T-4	Unit 15a, Cargo #28	DB00038RM	Isotopic (U, Pu, Am, Th),	125 ml glass
				total sulfur	125 ml glass
				total metals	250 ml glass
D87309	B891	Unit 1804, Cargo #11	DB00039RM	total sulfur	125 ml glass